

EXHIBIT D

Bonner, Kelly

From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Monday, February 1, 2021 6:12 PM
To: Priselac, Jessica
Cc: Adam Slater; Cheryll Calderon; Goldberg, Seth A.; Hansen, Forrest
Subject: RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

Counsel,

Plaintiffs will be using the following documents as exhibits to their opposition to ZHP's motion for a protective order, which will be filed momentarily.

ZHP00291945
ZHP01843066
ZHP00016117
ZHP00332356
ZHP00332903
ZHP01377828
ZHP00249181
ZHP01870977
ZHP00021455
ZHP01523947
ZHP00088944
ZHP02211431
ZHP00670999
ZHP00865174
ZHP00865188
ZHP00246515
ZHP00271397
ZHP01907462
ZHP02503597
ZHP01990527
ZHP00343409
ZHP00324681
ZHP01120762
ZHP00320410
ZHP00325056
ZHP02385354
ZHP01937518
ZHP00306319
ZHP00341377
ZHP00309217
ZHP00303912
ZHP00320441
ZHP00352121
ZHP00358575
ZHP00325765
ZHP00337032

ZHP00351971
ZHP00352112
ZHP00330623
ZHP02500007
ZHP02493784
ZHP00827480
ZHP00301610

We understand that you will not be able to assess whether these documents should remain confidential before Plaintiffs' opposition is filed. As a result, we will provide the documents to the Court for its in camera review.

Plaintiffs describe the above document in great detail in their brief, and those descriptions are hereby incorporated into this email.

In light of those descriptions, there is nothing about the documents that justifies treatment as confidential under the protective order, especially given the public health interests involved. Nevertheless, Plaintiffs are available to meet and confer regarding the confidentiality designations of these documents, as required before ZHP's motion to seal pursuant to the protective order.

Plaintiffs will also be relying on the following documents that have already been attached to prior filings with the Court:

ZHP01893902
ZHP00310874
ZHP02125655
TEVA-MDL2875-00082208
ZHP01976459
HUAHAI-US00008050

Due to the ongoing meet and confer, these documents will also be provided to the Court for its in camera review.

Best.
Chris

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